



September 16, 2010

Beth Hassett
Executive Director
WEAVE, Inc.
1900 K Street
Sacramento, Ca 95811

SUBJECT: Performance Assessment Report
GRANT #: DV09241196 & DR09011196
RECIPIENT NAME: The Center for Violence Free Relationships

Dear Ms. Hassett,

Thank you again for your time on September 15, 2010, when I conducted a Performance Assessment of the Domestic Violence Assistance (DV) Program grant for your agency. Attached please find a copy of the Performance Assessment including the Domestic Violence Recovery Act (DR) Addendum.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified the following areas which need corrective action.

Client Confidentiality

Current Policy: No written policy exists for the handling, storage, and eventual destruction of files, nor does a policy specifically identify the time period long term files should be kept.

Citation: Both the Victims Of Crime Act and the Family Violence Prevention Act contain provisions protecting the confidentiality of victims. Specifically, 42 U.S.C. 10402 (a)(2)(E) authorizes the state to ensure documented procedures have been developed and implemented (to include policies and procedures) "to assure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services by any program assisted under this chapter..."

Recommendation: Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client information. Evidence of the development of a written policy should be submitted to Cal EMA no later than **March 16, 2011**.

Functional Timesheets

Finding: The project is not currently using functional timesheets to track grant funded positions.

Citation: The Recipient Handbook (Section 11331) states "All grant-funded personnel must maintain time cards/sheets that indicate on a daily basis, the actual time worked on

each Cal EMA project and account for all the time worked by the employee during the pay period... An allocation plan may be used to allocate salaries and benefits for individuals who work on more than one program or grant (see Section 2173)."

Corrective Action: Currently, the project tracks employees' hours by grant budget and a pre-determined allocation. The allocation method is based entirely upon funding available to the agency. The current method does not indicate function; it merely indicates billing allocation. A copy of the new functional timesheet should be submitted to Cal EMA no later than **March 16, 2010**. Additionally, the Employee Handbook should be revised to provide policy as to the use of functional timesheets.

Fidelity Bond

Finding: The agency lacks a fidelity bond certificate that identifies the required information listed in the Recipient Handbook.

Citation: Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **March 16, 2011**.

Organizational and Personnel Policies and Procedures

Finding: The project lacks written standardized organizational policy and procedures that establish the process whereby data is collected and then reported. The project has some procedures for collecting data, but those procedures do not encompass all of the data collection or truly ensure the integrity of the data collection process.

Citation: Recipient Handbook Section 11350 states, "The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions... In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing."

Corrective Action: A comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, as well as all other procedural guidelines for the functioning of the business. This process should be completed no later than **March 16, 2010**.

Operational Agreements

Finding: The project lacks a valid Operational Agreement with local law enforcement agencies. Many of the OAs (MOUs) the agency has on file are expired and in need of updating.

Citation: Part I section C of the 2010/2011 RFA indicates projects must have Operational Agreements with Law Enforcement Agencies.

Corrective Action: The project must update the current MOU as soon as possible.

Evidence of the completion of this update should be submitted no later than **March 16, 2010**.

Written Policies for Responding to Emergency Medical Personnel

Finding: The project lacks written policies for responding to Emergency Medical Personnel.

Citation: The 2009/2010 RFA (Part II, Section A, subsection "b", number "iv") indicates agencies must provide written protocol for how they will provide 24 hour emergency response to law enforcement and medical personnel.

Corrective Action: The project should develop written policies that document their response to Emergency Medical Personnel. Evidence of the completion of said policy should be submitted to Cal EMA no later than **March 16, 2010**.

As for the other documentation that you were required to provide at the time of the site visit, I will be placing copies in your DV09/10 file and your master file at Cal EMA headquarters.

Enclosed is a copy of the completed Site Visit Checklist Form for your review. Please sign the cover page and return a copy of the page to me by **Monday October 18th, 2010 or sooner** as confirmation of receipt.

Thank you again for your hospitality during this visit. If you have any questions regarding the site visit please contact me at 916.324.9104 or Jason.Stalder@calema.ca.gov.

Jason Stalder
Criminal Justice Specialist
Domestic Violence Section

Enclosures

C: Cal EMA R&R Logistics